EPEAT Program
Continuous Monitoring Round Plan

Imaging Equipment
IE-2023-01
December 16, 2022

Background

EPEAT® is a comprehensive voluntary sustainability Type 1 ecolabel that helps purchasers identify sustainable technology products and services. Central to EPEAT are conformity assurance activities that meet the technical rigor and credibility needs of the institutional purchasers who rely upon EPEAT. The EPEAT Program ensures the ongoing conformance of EPEAT-registered products through an ongoing surveillance process known as Continuous Monitoring. Continuous Monitoring activities occur throughout the year and test the ability of Participating Manufacturers to prove conformance with EPEAT Criteria on an ongoing basis.

Some Continuous Monitoring activities require that Investigations be conducted in discrete timeframes called Rounds. The EPEAT Program develops an individual plan for each Continuous Monitoring Round, which specifies the EPEAT Criteria to be investigated, the method of investigation that GEC-approved Conformity Assurance Bodies (CABs) must use and the specific dates when the Investigation activities must be completed. The EPEAT Program also selects the Participating Manufacturers and EPEAT-registered products and assigns Investigations to CABs, which must fully participate in and are responsible for implementing Continuous Monitoring Round activities with their Participating Manufacturer clients. Participating Manufacturers are required to cooperate fully with their GEC-approved CAB during Round activities.

This document contains the individual plan for Continuous Monitoring Round IE-2023-01.

Continuous Monitoring Round IE-2023-01 Investigation Activities

Continuous Monitoring Round IE-2023-01 will use laboratory evaluation of products to determine the conformance of products with specific EPEAT Criteria. GEC-approved CABs obtain the products, as identified by the EPEAT Program, from the open market without involvement of the Participating Manufacturers, where possible, and send them for laboratory evaluation. The laboratories evaluate the products against the specified Criteria and produce reports summarizing the activities conducted and the results. GEC-approved CABs then review the reports, make recommendations on conformity and send the reports to the EPEAT Program, which makes the final decisions on conformity.

Continuous Monitoring Round IE-2023-01 Criteria and Product Selection

Continuous Monitoring Round IE-2023-01 will focus on chemicals of concern. The production of electronics often involves over 500 chemicals, while electronic devices potentially contain up to 84% of all known stable chemical elements. Chemicals in electronic products and processes serve important technical functions, however they are sometimes used without full knowledge of their environmental or human health hazards. These chemicals can present risks of exposure throughout the product's life cycle—and toxic chemicals used in creating electronics can cause serious health issues, including cancer, nerve damage, and reproductive issues. Once released into the environment, hazardous chemicals can also change soil or water, ultimately leading to the loss of plant or animal life.

In the electronics industry, chemicals of concern remain an on-going challenge as the industry seeks safer and more sustainable alternatives for hazardous chemical substances. Manufacturers can better prepare for and lessen their risk of supply chain interruptions and high switching costs associated with regulatory restrictions by having greater clarity into the contents of their devices. Minimizing the use of hazardous chemicals in electronics and embracing safer alternatives is critical to achieving sustainable consumption and production. Given the global nature of electronics value chains and the potential reach of problematic chemicals, the social and economic burden of chemicals of concern in electronics is not confined to certain people or places related to manufacturing or use—their potential impact can be global in scale, and for this reason, the EPEAT Program selected criteria which address chemicals of concern for investigation in this Round.

Products are randomly selected (using a random number generator) from a list of Participating Manufacturers. Each product is investigated for the criteria identified in the table below, however if a product has not selected a criterion, that criterion is not investigated.

Overview of Criteria and Products Selected	
Product Category	Imaging Equipment
Number of Products Selected	3
Criteria Selected	4.1.1.1—Compliance with provisions of European RoHS Directive upon its effective date
	4.1.2.1—Further reduction of the use of European Union RoHS Directive hazardous substances (cadmium)
	4.1.5.1—Compliance with provisions of European Union Battery Directive
	4.1.6.1—Reducing BFR/CFR/PVC content of external plastic casings
	4.8.1.1—Elimination of intentionally added heavy metals in packaging

Continuous Monitoring Round IE-2023-01 Schedule

Phase of Round	Date
Preparation Phase	
CABs notified of Round schedule and activities by EPEAT	December 16, 2022
CABs receive Round assignments and materials from EPEAT	December 16, 2022
Week of Round Training for CABs	Week of January 9, 2023
Investigation Phase (CABs performing investigations)	
Investigative period begins	January 16, 2023
Investigative period ends	June 15, 2023
Deadline for CAB submission of Investigation Reports and laboratory reports to EPEAT	June 29, 2023
Deliberation Phase (EPEAT making conformity decisions)	
Deliberation period begins	June 30, 2023
CABs receive Investigation Reports with final conformity decisions from EPEAT	August 14, 2023
Corrective Action Phase (for nonconformances, Participating Manufacturers restoring accuracy of EPEAT Registry)	
Corrective action period begins	August 21, 2023
Corrective action period ends	September 20, 2023
Deadline for CAB submission of corrective action reports to EPEAT	October 4, 2023
CABs receive final Investigation Reports with correction decisions from EPEAT	October 18, 2023
Reporting Phase	
Outcomes Report published	November 1, 2023

Process Details – Continuous Monitoring Using Laboratory Evaluation

Continuous Monitoring Rounds that use laboratory evaluation of products are conducted in accordance with EPEAT Policy Manual (P65) and EPEAT Conformity Assurance Implementation Requirements (also called EPEAT Requirements of CABs and Conformity Assurance Procedures) (P66) in effect at the time of the Round.

- The EPEAT Program downloads a list of all active EPEAT-registered products, selects products from the list for investigation and assigns EPEAT Criteria to the products, as per the Round Plan.
- GEC-approved CABs receive the list of products and EPEAT Criteria selected for their Participating Manufacturer clients but do not yet notify the Participating Manufacturers of the imminent investigations.
- The EPEAT Program publishes the Round Plan on the start date of the Round.
- GEC-approved CABs obtain products from the open market in the country specified by EPEAT without involvement of the Participating Manufacturers, where possible[1], and send them for evaluation by an

[1] A CAB may be unable to obtain a product in the market (e.g., some products are not commercially available or only sold through contracts). If unable to do so within 30 days of the start of the Round, the CAB product notifies the EPEAT Program and obtains the product directly from the Participating Manufacturer.

ISO 17025 accredited laboratory. Only after obtaining the products do GEC-approved CABs notify the Participating Manufacturers that their products have been selected for investigation.

- Laboratories evaluate the products against the specified Criteria and produce laboratory reports summarizing the activities conducted and the results.
- GEC-approved CABs review the laboratory reports to ensure they are clear and complete and make recommendations on conformity based on the evidence in each report. CABs also prepare an Investigation Report for each product.
- GEC-approved CABs submit the Investigation Reports and laboratory reports to the EPEAT Program. At the same time, CABs forward these same Reports to the Participating Manufacturers.
- The EPEAT Program reviews the Investigation Reports and laboratory reports and makes the final decisions on conformity. The EPEAT Program then sends the Investigation Reports back to the GEC-approved CABs.
- GEC-approved CABs send the Investigation Reports with the final decision on conformity and the accompanying laboratory reports to the Participating Manufacturers.
- For final decisions of nonconformance, Participating Manufacturers must make corrections within 30 calendar days to restore the accuracy of the EPEAT Registry.
- The EPEAT Program publishes an Outcomes Report identifying the nonconforming products and Participating Manufacturers, as well as the actions taken to restore accuracy of the EPEAT Registry.

Document Control and Change History						
Issue	***Revision***	***Owner***	***Approver***	***Description***	***Approval Date***	***Effective Date***
1	*0*	*Sr Manager, Ecolabels and Resources*	*Director, EPEAT Program*	*Initial release*	*2020 Aug 20*	*2020 Aug 23*
1	*1*	*Senior Manager, Ecolabels and Resources*	*Senior Director, Ecolabels and Manufacturer Resources*	*Updates throughout to match revisions to P66. Level 2/3 now called Level 2. Addition of Preparation Phase to schedule table.*	*2021 Feb 15*	*2021 Feb 18*